

201-15350

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR


**American
Chemistry
Council**
*Good Chemistry
Makes It Possible*

June 14, 2004

Via E-mail and US Mail

Mr. Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

**Re: Rubber and Plastics Additives (RAPA) Panel
HPV Chemical Challenge Program (Program)
Changes in Chemicals Sponsored by the RAPA Panel**

RECEIVED
OPPT/CHIC
04 JUN 15 PM 12:59

Dear Mr. Leavitt:

On November 22, 1999, the RAPA Panel (Panel) of the American Chemistry Council volunteered to serve as an industry consortium under the Program. Additional correspondence concerning the RAPA Panel's commitments were submitted on December 30, 1999, February 1, 2000, November 5, 2001, November 7, 2001, December 18, 2001, December 20, 2002, July 3, 2003 and February 5, 2004. Members of the RAPA Panel HPV consortium include: Alco Chemicals; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; and Noveon, Inc.

By this letter, the RAPA Panel informs EPA of the change in status of one chemical. Table 1, attached, lists the 35 chemicals sponsored in the Program by the Panel as of December 31, 2003. However, Table 1 mistakenly includes Benzothiazolesulfenamide, N,N-dicyclohexyl- (CAS Number 4979-32-2), which EPA has designated with the indicator value "2," reflecting that this chemical is "*A chemical that is otherwise being handled under the Organization for Economic Co-operation and Development (OECD) HPV Screening Information Data Set (SIDS) Program.*" Japan is the sponsor country for this chemical in the SIDS Program, and the case was considered at the 18th SIDS Initial Assessment Meeting (SIAM) in April 2004 (<http://cs3-hq.oecd.org/scripts/hpv/>). Although the RAPA Panel did not sponsor the chemical in the Program, data for the chemical were used to support the *Sulfenamide Accelerators Category*, and data for CAS Number 4979-32-2 were included in the submission dated November 30, 2001 (<http://www.epa.gov/chemrtk/sulfaccl/c13323tc.htm>).

Table 2, attached, contains the list of Panel-sponsored chemicals, revised to reflect the final list of 34 chemicals sponsored in the Program by the Panel. Test plans and robust summaries have been submitted to the Program for the 34 chemicals sponsored by the RAPA Panel, and revised submissions have been made for many categories and chemicals.



Responsible Care®

Michael O. Leavitt
Supplement to HPV Commitment
June 14, 2004
Page 2 of 4

Additionally, data have been submitted for a number of chemicals to support conclusions reached for sponsored chemicals and categories. Data were submitted for Benzothiazolesulfenamide, N,N-dicyclohexyl- (CAS Number 4979-32-2) as a supporting chemical.

Comments received from EPA and the public so far have generally agreed that the RAPA chemicals have a robust set of existing data, reflecting the high level of understanding of potential hazards. In a few instances, the Panel agrees with EPA or other commenters that collection of additional data is warranted to address Program requirements. The Panel plans to collect these data and submit the results to the Program.

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments

cc: C. Auer, EPA
R. Denison, Environmental Defense

Table 1
Chemicals Sponsored by the Rubber & Plastic Additives (RAPA) Panel as of December 31, 2003
Highlighted Chemical was Mistakenly Included as "Sponsored by RAPA."

Chemical Name	CAS Number
Phenol, 4,4'-butylidenebis [2-(1,1-dimethylethyl)-5-methyl]	85-60-9
Benzothiazole, 2-(morpholinodithio)-	95-32-9
Phenol, 4,4'-thiobis[2-(1,1-dimethylethyl)-5-methyl]	96-69-5
Sulfide, bis(dimethylthiocarbamoyl)	97-74-5
Disulfide, bis(diethylthiocarbamoyl)	97-77-8
Diphenylamine, 4,4'-dioctyl-	101-67-7
p-Phenylenediamine, N,N'-di-sec-butyl-	101-96-2
Benzothiazole, 2-(morpholinothio)-	102-77-2
Disulfide, bis(dimethylthiocarbamoyl)	137-26-8
2(3H)-Benzothiazolethione	149-30-4
2(3H)-Benzothiazolethione, zinc salt	155-04-4
2(3H)-Benzothiazolethione, sodium salt	2492-26-4
p-Phenylenediamine, N-(1,4-dimethylpentyl)-N'-phenyl-	3081-01-4
p-Phenylenediamine, N,N'-bis(1,4-dimethylpentyl)-	3081-14-9
2-Benzothiazolesulfenamide, N,N-dicyclohexyl-	4979-32-2
p-Cresol, 2,2'-methylenebis[6-nonyl]-	7786-17-6
Diphenylamine, 4,4'-bis(alpha,alpha-dimethylbenzyl)-	10081-67-1
Benzenamine, ar-nonyl-N-(nonylphenyl)-	36878-20-3
Phenol, styrenated	61788-44-1
Benzenamine, N-phenyl-, reaction products with 2,4,4-trimethylpentene	68411-46-1
Benzenamine, N-phenyl-, styrenated	68442-68-2
Phenol, isobutylenated methylstyrenated	68457-74-9
Benzenamine, 2-ethyl-N-(2-ethylphenyl)-, (tripropenyl) derivatives.	68608-77-5
Phenol, 4-methyl-, reaction products with dicyclopentadiene and isobutylene	68610-51-5
Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene	68921-45-9
1,4-Benzenediamine, N,N'-mixed Ph and tolyl derivatives.	68953-84-4
Benzenamine, N-phenyl-, reaction product with isobutylene and 2,4,4-trimethylpentene	184378-08-3
Carbamic acid, dimethyldithio-, sodium salt	128-04-1
Zinc, bis(dibutyldithiocarbamate)-	136-23-2
Phenol, 4,4'-isopropylidenebis[2-tert-butyl]-	79-96-9
Guanidine, 1,3-diphenyl-	102-06-7
Morpholine, 4,4'-dithiodi-	103-34-4
Morpholine, 4-[(morpholinothiocarbonyl)thio]-	13752-51-7
Phthalimide, N-(cyclohexylthio)-	17796-82-6
1,3,5 Tris(3,5-di-terb-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	27676-62-6

Table 2
Revised List of Chemicals Sponsored by the Rubber & Plastic Additives (RAPA) Panel
as of June 10, 2004

Chemical Name	CAS Number
Phenol, 4,4'-butylidenebis [2-(1,1-dimethylethyl)-5-methyl]	85-60-9
Benzothiazole, 2-(morpholinodithio)-	95-32-9
Phenol, 4,4'-thiobis[2-(1,1-dimethylethyl)-5-methyl]	96-69-5
Sulfide, bis(dimethylthiocarbamoyl)	97-74-5
Disulfide, bis(diethylthiocarbamoyl)	97-77-8
Diphenylamine, 4,4'-dioctyl-	101-67-7
p-Phenylenediamine, N,N'-di-sec-butyl-	101-96-2
Benzothiazole, 2-(morpholinothio)-	102-77-2
Disulfide, bis(dimethylthiocarbamoyl)	137-26-8
2(3H)-Benzothiazolethione	149-30-4
2(3H)-Benzothiazolethione, zinc salt	155-04-4
2(3H)-Benzothiazolethione, sodium salt	2492-26-4
p-Phenylenediamine, N-(1,4-dimethylpentyl)-N'-phenyl-	3081-01-4
p-Phenylenediamine, N,N'-bis(1,4-dimethylpentyl)-	3081-14-9
p-Cresol, 2,2'-methylenebis[6-nonyl]-	7786-17-6
Diphenylamine, 4,4'-bis(alpha,alpha-dimethylbenzyl)-	10081-67-1
Benzenamine, ar-nonyl-N-(nonylphenyl)-	36878-20-3
Phenol, styrenated	61788-44-1
Benzenamine, N-phenyl-, reaction products with 2,4,4-trimethylpentene	68411-46-1
Benzenamine, N-phenyl-, styrenated	68442-68-2
Phenol, isobutyleneated methylstyrenated	68457-74-9
Benzenamine, 2-ethyl-N-(2-ethylphenyl)-, (tripropenyl) derivatives.	68608-77-5
Phenol, 4-methyl-, reaction products with dicyclopentadiene and isobutylene	68610-51-5
Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene	68921-45-9
1,4-Benzenediamine, N,N'-mixed Ph and tolyl derivatives.	68953-84-4
Benzenamine, N-phenyl-, reaction product with isobutylene and 2,4,4-trimethylpentene	184378-08-3
Carbamic acid, dimethyldithio-, sodium salt	128-04-1
Zinc, bis(dibutyldithiocarbamato)-	136-23-2
Phenol, 4,4'-isopropylidenebis[2-tert-butyl]-	79-96-9
Guanidine, 1,3-diphenyl-	102-06-7
Morpholine, 4,4'-dithiodi-	103-34-4
Morpholine, 4-[(morpholinothiocarbonyl)thio]-	13752-51-7
Phthalimide, N-(cyclohexylthio)-	17796-82-6
1,3,5 Tris(3,5-di-terb-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	27676-62-6